

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

UNITED STATES OF AMERICA

v.

MARCUS Q WALDEN

Case No.: 7:21-cr-00036-WLS-TQL-1

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO PREPARE AND FILE
OBJECTIONS TO THE DRAFT PRESENTENCE REPORT**

COMES NOW the defendant, Marcus Q Walden, by and through undersigned counsel, and respectfully requests the court extend the deadline for the filing of objections to the draft presentence report (DPSR). In support he shows as follows:

(1)

Mr. Walden was indicted on August 12, 2021 and charged with 3 felony counts. (Doc.1) On October 4, 2021, Mr. Walden made his first appearance, entered a not guilty plea, and counsel was appointed. (Docs 7, 12, 14, 16) On October 12, 2021 Mr. Walden entered a negotiated plea of guilty to count three of the indictment. (Docs 20-22). On December 16, 2021 the DPSR was filed in Mr. Walden's case, making any objections due December 30, 2021.

(2)

Mr. Walden has an extensive prior criminal history. Undersigned counsel has been diligently working to gather records from the relevant prior convictions but does not yet have them all. He anticipates objecting to how the DPSR categorizes certain prior convictions but needs the records to perfect those objections.

(3)

Mr. Walden is in custody of the US Marshal and will remain so through sentencing. His sentencing hearing is currently scheduled for January 20, 2021. If the record-gathering process is not complete by January 7, 2021 undersigned counsel will file a Motion to Continue the sentencing hearing, to allow for the gathering of the necessary records, the filing of objections to the DPSR and time for the DPSR writer to respond well in advance of the sentencing hearing.

WHEREFORE, Mr. Walden respectfully requests that this court grant the motion, and allow him an additional 7 days in which to file his objections to the DPSR, or a motion to continue the sentencing hearing.

Respectfully submitted,

/s/Timothy R. Saviello

Timothy R. Saviello

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SO ORDERED this 3rd day
of January, 2022
W. Louis Sands
W. Louis Sands, Sr. Judge
United States District Court